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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: 1BR-FOD0813/TR/E2/H1/J17/B1

February 10, 2011

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RE: Submission of Spill Contingency Plan, Operation and Maintenance Plan, Post-Construction Monitoring Plan, and 2009 Annual Report, Defence Construction Canada, FOX-3, Dewar Lakes DEW Line Site, Licence No. 1BR-FOD0813

Dear Mr. Craig & Ms. Schulz:

The Nunavut Water Board ("NWB" "Board") received on April 3, 2009, from AECOM Canada Ltd., on behalf of Defence Construction Canada (DCC), the following documents required under the respective terms and conditions of Licence 1BR-FOD0813:

1. "Operation & Maintenance Plan, FOX-3, Dewar Lakes Dew Line Site, 1BR-FOD0813" dated March 19, 2009 and required under *Part E, Item 2*;
2. "Post Construction Monitoring Plan, FOX-3, Dewar Lakes DEW Line Site, 1BR-FOD0813" dated March 20, 2009 and required under *Part J, Item 17*; and
3. "Spill Contingency Plan, Updated, FOX-3, Dewar Lakes DEW Line Site, 1BR-FOD0813" dated March 20, 2009, required under *Part H, Item 1*.

On January 25, 2010, the Board acknowledged receipt of the above-referenced documents and distributed to interested parties and persons for a thirty-day review period. On or before the deadline for comments, February 25, 2010, submissions were received from two intervening parties¹. Each of intervening parties provided recommendations with respect to improving the overall functionality of the plans.

Internal reviews, in which the interveners' comments were noted, determined that the Plans are consistent with the terms and conditions in Licence No. 1BR-FOD0813. The NWB has therefore approved Plans under **Motion No. 2010-23-L19**.

¹ Environment Canada (EC) dated February 25, 2010 and March 20, 2006; and Indian and Northern Affairs Canada (INAC) dated February 12, 2010.

However, to address issues identified in the reviews and by the intervening parties, the Licensee is required to make the following changes to the Plans and submit to the Board for review before March 31, 2011:

Operation & Maintenance Plan

- The Plan primarily centres on the construction of the proposed facilities. To the contrary, more emphasis should be placed on operational procedures for the applicable facilities;
- Section 3 of the Plan, which pertains to the Sewage Disposal Facilities, should include the following items: temporary shutdown procedures and measures to address abnormal operating conditions such as seepage, overflow, and effluent quality not meeting the discharge criteria in the Licence;
- If the construction to phase of the project has been completed for the various facilities, as-built drawings should be included in the Plan;
- Information pertaining to the frequency at which each facility would be inspected should be included in the Plan;
- A section of the Plan should be allocated to include formation for each of the relevant facilities under the Licence;
- Environment Canada's Technical Document on Batch Waste Incineration should be consulted for appropriate incineration technologies prior to the incineration of waste;
- Include provisions to address the accumulation, removal and handling of solids or sludge from the Sewage Disposal Facility;
- For Sewage Disposal Facilities, the discharge methods, operation and maintenance procedures and frequency of each of the procedures should be included in the Plan;
- Include options for handling excess water that may be collected during excavation of the Airstrip landfill; and
- Plan should include a site map, in an appropriate scale, depicting the location of Sewage Disposal Facilities and Solid Waste Disposal Area. Information pertaining to the dimensions of Solid Waste Disposal Facilities, and prevailing wind directions should also be included.

Post-Construction Monitoring Plan

- in addition to the monitoring program for the five landfills, the Plan should also address monitoring of the Sewage Disposal Facilities;
- Confirm the guidelines to which the monitoring results will be compared; and
- Provide, for each landfill, information pertaining to the proposed locations, depth, intervals at which temperature will be measured, and number of thermal strings to be installed.

Spill Contingency Plan

- Include a copy of the NT-NU Spill Report Form;
- Include Contact number for INAC's Manager of Field Operations;
- Include topographic map, in an appropriate scale, that depicts nearby building facilities, roads culverts, cash basins, drainage pattern and nearby water bodies, fuel storage and contaminated soil storage and any other relevant information;
- The Plan should state that spills involving all deleterious substances, regardless of size, will be reported to NT-NU 24hr Spill Report Line; and
- A detailed map of an appropriate scale depicting fuel storage and contaminated soil storage area, location of spill kits, camp infrastructure, near water bodies, drainage patterns, roads, culverts, any other relevant information should be included in the Plan;

In addition to the above referenced Plans, the NWB reviewed the 2009 Annual Report, which was received on April 13, 2010 and distributed publicly, for information purposes, on April 26 2010. No comments have been received to date from interested persons. The review found that the document met most of the reporting requirements in the Licence. The Licensee, however, is required to address the following items and submit to the Board in the form of an addendum by March 31, 2011.

- Page 2 of the report states that in addition to consultations identified in the project description, the contractor typically holds a project start up meeting each season. Reports or details of those consultations should be provided in the annual report as required in accordance with section Part B, Item 1(xv);
- Page 2 of the annual report cover letter stated that the Tier II Disposal Facility was completed in 2009. As-Built drawing for this facility should be provided;
- The report stated that spill contingency Plan has been approved; however, NWB have no records to suggest that this Plan was approved ;

- The report stated that a small volume of debris was placed in the Non-hazardous; Solid Waste Disposal Facilities. Part B, Item 1(iii), requires that the actual or approximate volume of waste be provided;
- Action taken to prevent spills in the future should be included in the annual report; and
- Summary of all Plans, reports or studies conducted under the licence should be in English and Inuktitut as required under Part B, Item 1(xvii).

Should you have any question please feel free to contact the undersigned at 867-360-6338 ext. 25 or by email at sjoseph@nunavutwaterboard.org.

Yours truly,

Original Signed By:

Sean Joseph
Technical Advisor

Cc: Distribution List –Qikiqtani Region